

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO PUBLIC REPRESENTATIVE INTERROGATORIES
(PR/USPS-T1-5 THROUGH 7)**

The United States Postal Service hereby files the responses of witness David Williams to the above-listed interrogatories of the Public Representative dated April 3, 2012, waiving its right to object to these questions on the basis that the deadline for discovery directed to witness Williams was February 24, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
TO PUBLIC REPRESENTATIVE INTERROGATORY**

PR/USPS-T1-5

Please refer to page 5 of your testimony where you describe the objective of the modeling exercise as “to determine whether excess capacity could be reduced significantly within the network if service obligations and operating constraints driven by current overnight First-Class Mail service standards were changed.”

- a. Why was this modeling exercise directed at assessing the cost consequences of service standards reductions for First Class Mail?
- b. Have similar analyses of the potential for cost reductions been directed at other mail classes?
- c. If yes, which other mail classes?

RESPONSE

- a. The driver of network capacity is the First-Class Mail overnight service standard. Such service standard dictates when DPS processing can occur, and constrains the operating windows leading to equipment requirements, facility requirements and labor requirements.
- b. No.
- c. N/A

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PR/USPS-T-1-6

Please refer to page 10 of your testimony where you state that, of the 251 Processing and Distribution Centers/Facilities, some 200 of those centers will remain. Please provide data on the mix of mail handled by centers/facilities that are staying open versus those that are closing. If final selection of locations to close has not yet determined; please provide the data for a likely or representative set of plants likely to remain open and plants likely to be closed.

RESPONSE

The numbers have been adjusted based on the February 23 consolidation decisions. Based on MODS workload, the percentage across operations is as follows in the consolidated sites, versus the non-consolidated sites:

Shape	Non-Consolidated Site	Consolidated Site
Letter	90.9%	92.6%
Flats	6.9%	6.0%
Parcel / Pri / Bundle	2.2%	1.4%

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PR/USPS-T-1-7

Please list the revenues and piece count by category of mail and by service standard within that category. Thus, for First-Class Mail, please report revenue and piece count for the portion of First-Class Mail that moved on origin/destination combinations that have a one day service standard, for the portion where the standard is two days, and for the portion where the standard is three days. Please provide this data for each category of mail for which service standards are proposed to change.

RESPONSE

This question is not clear. However, if what it seeks is an estimate of First-Class Mail volumes and revenues by rate category that have a particular service standard or for which the service standard will be affected by network rationalization, I am informed that the question seeks data not within the possession of the Postal Service.